

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	CONSENT PRELIMINARY ORDER
- v. -	:	OF FORFEITURE/
	:	<u>MONEY JUDGMENT</u>
STEPHEN BOND-NELSON,	:	
	:	22 Cr. 137 PAE)
Defendant.	:	
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WHEREAS, on or about March 3, 2022, STEPHEN BOND-NELSON (the “Defendant”), was charged in an Information, 22 Cr. 137 (DLC) (the “Information”), with conspiracy to commit securities fraud, investment adviser fraud, and wire fraud, in violation of Title 18, United States Code, Section 371 (Count One); securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff; Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 2 (Count Two); investment adviser fraud, in violation of Title 15, United States Code, Sections 80b-6(4) and 80b-17, Title 17, Code of Federal Regulations, Section 275.206(4)-8, and Title 18, United States Code, Section 2 (Count Three); and conspiring to obstruct justice, in violation of Title 18, United States Code, Section 371 (Count Four);

WHEREAS, the Information included a forfeiture allegation as to Counts One through Three of the Information, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, of all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses charged in Counts One through Three of the Information, including but not limited to a sum of money in United States currency representing the amount of proceeds

traceable to the commission of the offenses charged in Counts One through Three of the Information that the Defendant personally obtained;

WHEREAS, on or about March 3, 2022, the Defendant pled guilty to Counts One through Four of the Information;

WHEREAS, in satisfaction of his forfeiture obligation, the Defendant agrees to forfeit to the Government his interest in any unpaid deferred compensation and any funds invested with Allianz Global Investors, including any restitution claim for lost invested funds, in the total amount of approximately \$1,610,465, representing proceeds traceable to the offenses charged in Counts One and Two of the Information that the Defendant personally obtained; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offenses charged in Counts One and Two of the Information that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Matthew Podolsky, Acting United States Attorney, Assistant United States Attorney Thomas Burnett, of counsel, and the Defendant and his counsel, Adam Lurie, Esq., that:

1. As a result of the offenses charged in Counts One through Three of the Information, to which the Defendant pled guilty, a money judgment reflecting the defendant's forfeiture to the Government of his interest in any unpaid deferred compensation and any funds invested with Allianz Global Investors, including any restitution claim for lost invested funds, in the total amount of \$1,610,465, representing proceeds traceable to the offenses charged in Counts

One through Three of the Information that the Defendant personally obtained (the “Money Judgment”), shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant STEPHEN BOND-NELSON, and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Marshals Service, and delivered by mail to the United States Attorney’s Office, Southern District of New York, Attn: Illicit Finance and Money Laundering Unit, 26 Federal Plaza, 38th Floor, New York, New York 10278 and shall indicate the Defendant’s name and case number.

4. The United States Marshals Service is authorized to deposit the payments on the Money Judgment into the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Title 21, United States Code, Section 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.


6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney’s Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

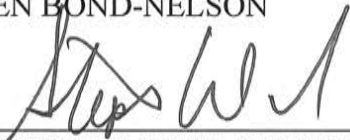
AGREED AND CONSENTED TO:

MATTHEW PODOLSKY
Acting United States Attorney for the
Southern District of New York

By: 

THOMAS BURNETT
Assistant United States Attorney
26 Federal Plaza
New York, NY 10278
(212) 637-1064

2/25/25
DATE

STEPHEN BOND-NELSON
By: 

STEPHEN BOND-NELSON


2/25/25
DATE

By: 

ADAM LURIE, ESQ.
Attorney for Defendant

2/25/25
DATE

SO ORDERED:



HONORABLE PAUL A. ENGELMAYER
UNITED STATES DISTRICT JUDGE

2/25/25
DATE